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Attorneys for Counterdefendant
Land Home Financial Services, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RODNEY MOTT,

Plaintiff,

vs.

THE PNC FINANCIAL SERVICES GROUP,
INC.; SELECT PORTFOLIO SERVICING,
INC.; TRINITY FINANCIAL SERVICES, LLC
and TROJAN CAPITAL INVESTMENTS, LLC;
RADIAN SERVICES, LLC; and SPECIAL
DEFAULT SERVICES, INC.,

Defendants.

TROJAN CAPITAL INVESTMENTS, LLC;

Counterclaimant,

vs.

RODNEY MOTT; RADIAN SERVICES, LLC;
PNC BANK, N.A.; THE PNC FINANCIAL
SERVICES GROUP, INC.; BANK OF
AMERICA, N.A.; SELECT PORTFOLIO
SERVICING, INC.; WILMINGTON TRUST,
NATIONAL ASSOCIATION, not in its
individual capacity but solely as trustee under the
Greenwich Investors XL Pass-Through Trust
Agreement; DTA SOLUTIONS LLC; BSI
FINANCIAL SERVICES INC.;
DREAMBUILDER INVESTMENTS LLC;

Case No.: 2:16-CV-01949-JCM-CWH

JOINT MOTION AND ORDER TO
EXTEND DEADLINE

1 LAND HOME FINANCIAL SERVICES, INC;
2 and Also all other persons unknown claiming any
3 right, title, estate, lien or interest in the real
4 property described in the counterclaim adverse to
5 counterclaimant's ownership in the referenced
6 lien and note stated herein, or any cloud upon
7 counterclaimant's title to the referenced lien and
8 note herein inclusive;

Counterdefendants.

9 **JOINT MOTION AND ORDER TO EXTEND DEADLINE**

10 Counterdefendant Land Home Financial Services, Inc. ("Land Home") and
11 Counterclaimant Trojan Capital Investments, LLC ("Trojan") (Land Home and Trojan
12 collectively, the "Parties"), by and through their counsel of record, jointly move to extend the
13 deadline for Land Home to respond to Trojan's counterclaim (ECF Doc. No. 38). The Parties
14 state that:

- 15 1. On August 16, 2016, this action was initiated by Plaintiff Rodney Mott.
- 16 2. On March 13, 2017, Trojan filed an amended answer and counterclaim, naming
17 Land Home as a counter-defendant (ECF No. 38).
- 18 3. The Parties now stipulate and agree to extend Land Home's deadline to respond
19 to the counterclaim to June 19, 2017.
- 20 4. This is the Parties' first request for an extension of this deadline, which is not
21 intended to cause any delay or prejudice to any party.

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1 5. The extension will allow Land Home to fully investigate Trojan's allegations in
2 the counterclaim so that Land Home may appropriately respond thereto.

3 Dated this 15th day of June, 2017

Dated this 15th day of June, 2017

4 SCHWARTZ FLANSBURG PLLC

BURKE, WILLIAMS & SORENSON, LLP

5 /s/ Frank M. Flansburg III
6 Frank M. Flansburg III, Esq.
7 Nevada Bar No. 6974
8 6623 Las Vegas Blvd. South, Suite 300
9 Las Vegas, Nevada 89119

/s/ Richard J. Reynolds
Richard J. Reynolds, Esq.
Nevada Bar No. 11864
1851 East First St., Ste. 1550
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10 Attorneys for Counterdefendant
11 Land Home Financial Services, Inc.

Michael R. Brooks, Esq.
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BROOKS HUBLEY, LLP
1645 Village center Cir., Ste. 60
Las Vegas, NV 89134

Attorneys for Counterclaimant
Trojan Capital Investments, LLC

13 **ORDER**

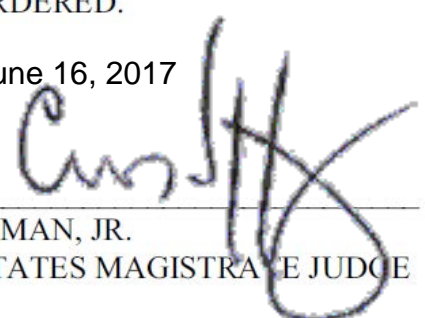
14 IT IS SO ORDERED.

15 IT IS SO ORDERED.

16 DATED: June 16, 2017

17 Submitted By:

18 SCHWARTZ FLANSBURG PLLC

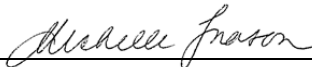
19 
C.W. HOFFMAN, JR.
UNITED STATES MAGISTRATE JUDGE

20 /s/ Frank M. Flansburg III
21 Frank M. Flansburg III, Esq.
22 Nevada Bar No. 6974
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24 Las Vegas, Nevada 89119
25 Attorneys for Counterdefendant
26 Land Home Financial Services, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of June, 2017., I served a copy of the foregoing **JOINT MOTION AND ORDER TO EXTEND DEADLINE** upon each of the parties via electronic service through the United States District Court for the District of Nevada's ECF system.



Michelle Tuason, an employee of Schwartz
Flansburg PLLC